

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.

Defendants.

Case No. 2:22-CV-00422-JRG-RSP

JURY TRIAL DEMANDED

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TO FILE CORRECTED BILL OF COSTS**

Defendants Samsung Electronics Co., LTD and Samsung Electronics America, Inc. (collectively "Defendants" or "Samsung") respectfully submit this motion to request an extension of time to comply with the Court's Standing Order Regarding Bill of Costs.

On April 7, 2025, Samsung inadvertently filed its proposed Bill of Costs (Dkt. 513) before satisfying the Court's Standing Order Regarding Bill of Costs meet and confer requirement. *See* Dkt. 513. Samsung respectfully requests an extension of time until May 8, 2025, to allow the parties to complete the required meet and confer process in compliance with the Court's Standing Order, and to refile its Bill of Costs thereafter.

As Headwater requests and as the Court Order and Rules state, Samsung agrees to send Headwater a revised bill of costs that complies with this Court's Standing Order, and meet and confer with Headwater regarding areas of disagreement. Samsung expects the parties will be able to resolve some of the issues raised in Headwater response (Dkt. 514) and submits that the requested extension will facilitate that process.

Samsung conferred with Headwater regarding the present request for an extension of time. Headwater does not oppose the present request but reserves the right to object to Samsung's revised bill of costs based on non-compliance with the Court's Standing Order.

Dated: April 13, 2025

Respectfully submitted,

By: /s/ Sara C. Fish
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SAMSUNG ELECTRONICS AMERICA, INC.

CERTIFICATE OF CONFERENCE

Pursuant to Local Rules CV-7(h) and (i), I hereby certify that counsel of record for Samsung and Headwater have met and conferred, including with counsel Kris Davis. Headwater does not oppose this motion.

/s/ Sara C. Fish
Sara C. Fish

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on April 13, 2025. As of this date, all counsel of record had consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Sara C. Fish
Sara C. Fish